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November 25, 2003

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: WC Docket No. 01-321; WC Docket No. 02-112; and CC Docket No. 00-175**

Dear Ms. Dortch:

On November 13, 2003 representatives from BellSouth met with members of the Commission's Wireline Competition Bureau. The purpose of the meeting was to reiterate the reasons for BellSouth's belief that there is no need for a federally-mandated special access performance assurance plan; to respond to FCC staff questions about the metrics and standards that JCIG has proposed for such a plan; and to offer a plan that the Commission could use in lieu of the JCIG proposal if the Commission nonetheless decides to prescribe metrics and standards for interstate special access services. During that meeting the staff asked BellSouth to respond to some additional questions. Today's letter includes the requested responses.

**1. For Special Access services what is the charge to a Special Access customer when an appointment is missed due to a CNR event?**

Missed Appointments (Customer Not Ready) are provisioning appointments missed because the subscriber or subscriber's representative is not ready for service at the time of the prearranged technician's visit or when, at the time of the pre-survey, it is ascertained that the subscriber will not be ready and has not requested a later date. Also included are cases when items to be provided by the subscriber or subscriber's representative have not been furnished or are not satisfactory (such as location of network interface not provided, no conduit, no backboard, final grade not reached, developer cut cable/conduit/military installations requiring government approval for placement or replacement of facilities, etc.). As is discussed in item 2 below, there are several checks and balances to prevent the BellSouth technician from misapplying the

CNR code. Among these are an impact on productivity due to multiple visits to install the order and disciplinary action if warranted.

As reflected in the Special Access tariff, BellSouth charges its customers an order modification charge of \$31.60 for the rescheduling of a service due date. BellSouth charges its customers a charge of \$150 for a missed appointment when a technician was dispatched to the customer's premises.

An appointment is not considered missed if the customer provides notification to BellSouth before 3PM on the day prior to the scheduled service date and requests a change to the due date.

**2. Please describe the process and rationale a BellSouth technician on a customer's premises follows before concluding that an appointment is missed due to customer not ready conditions.**

For special access services, on a technician visit to the end users location, the technician attempts to gain access to the customer's premises and to the customer's internal communications room. Failure to gain access or permission to gain access is considered to be a "customer not ready" event. For example, if a technician gains access to the building and the customer is aware of the installation order, but the communications room is locked and the personnel with the key is home sick, this would be coded as a "customer not ready" event, as it would not be reasonable for the technician to sit idle and delay other jobs, while the end user customer tries to contact the key holder and have him come into the office. However, the technician is motivated to complete the installation work upon the initial installation appointment and will accept minor delays, as completed installations are one measure of the technician's productivity.

In these situations where the end user is not ready or when the technician cannot gain access to a customer premises, the technician will place the "customer not ready" jeopardy code on the order with an associated log note entered into the work force administration system. This latter action notifies a work center to place an appropriate missed appointment code on the order, which notifies a BellSouth service representative that a new date is required. The BellSouth service representative then notifies the IXC or CLEC of the missed appointment and that a new service date is required. The verification is limited to the technicians visit, the jeopardy code assignment, and log notes. A technician describing anything other than what actually occurred could be disciplined for falsification of records.

In reviewing this process, it is important to note that BellSouth uses this process when it is serving the IXC or CLEC customer, and not the end user. BellSouth is prohibited from negotiating delivery options directly with the IXC's or CLEC's end user customer and BellSouth expects, when we haven't been informed otherwise, that both the carrier customer and end-user customer will ready on the scheduled service date.

**3. Please discuss the unique nature of projects, including the range of time it takes to complete different projects and why this variance occurs.**

Access Project Management enhances the delivery of BellSouth Access services. Working directly with the customer, project managers handle coordination, tracking and resolution of roadblocks to ensure the smooth delivery of BellSouth Access products.

A project is defined as any type of service request with a well-defined set of desired end results. It offers a specific beginning and ending point for installation requests that require external and internal coordination to procure the facilities or equipment and resources needed to meet a Customer Desired Due Date (preferably negotiated). More specifically, service requests are designated as projects because of the complexity of the product/service offering and the quantity of the services requested, or both. Although they normally use existing processes or systems, a project manager is needed to monitor, track and measure the installation because of factors like those identified in the preceding sentence. A matrix in the BellSouth Guide to Interconnection defines what normally qualifies as a project, but additional service requests may be designated for project management when BellSouth and the carrier making the request agree that a project manager can add value to the delivery of a product or service.

The customer initiates the request for project management either in writing via the account team or sometimes verbally. Before a service request that falls outside of the guidelines can be designated as a project, the IXC or CLEC customer must agree to the designation. BellSouth occasionally suggests project management for provisioning work outside of its guidelines, in order to increase the likelihood of a successful completion of the work items. The volume and complexity of a particular service request generally requires commitments from multiple BellSouth departments. When a customer or account team sends a project request, the BellSouth Project Managers assemble a team that represents the involved departments and then hold a meeting or conference call to negotiate the least amount of time required to perform the work, with the customer requested due date as the targeted date for completion. The project manager then gives the negotiated dates to the customer. This negotiation process takes from five to seven business days. The notice back to the customer defines the due date. Overall project durations have a variety of time ranges from initiation to completion; factors contributing to the length of the project include quantity of circuits requested, complexity of work, preparation work required (e.g., equipment room prep), and customer and company resource availability.

A large percentage of the projects BellSouth handles are requests for network grooming (optimization). These projects entail the movement of multiplexed DS3's to different DS3 facilities (facility roll). Customers do this for a number of reasons; they may request grooming to increase their network's efficiency. They may request grooming to move from one provider to another or to upgrade to a ring. For most of these reasons, the grooming usually requires a disconnect and an add order for the

DS3 and for all circuits riding it. Project Management works to ensure that coordination takes place among all groups involved in disconnecting and adding the required circuits. The process requires that the new DS3 CFA's (Carrier Facility Assignments) be placed on the orders associated with the DS1s riding on that DS3 and then that the new CFA of each of the DS1s is placed on the orders associated with all the DS0 circuits riding on that DS1. Each level of the DS3 needs to have been designed before the next lower level orders can flow. Also, because usually just one end of the DS3 moves, close examination of the new designs must take place to ensure that changes were only made where they were requested. Before switching to the new DS3 from the old, most customers request that BellSouth pre-tests new path with them, so coordination between companies is required. All of this coordination helps prevent loss of service to our customers.

BellSouth also uses the project management tool for installation of complex new services, such as LightGate (BellSouth's DS3 level service) and SmartRings (BellSouth's High-Speed Dedicated Ring Transport, OC-3 through OC-192). Successful installation of both of these products requires close coordination between BellSouth departments and the customer. These services may require construction at the customer site, placement of fiber facilities, provisioning of power and ordering and installation of equipment.

CLECs erroneously suggest that the project designator can be over used and misapplied. Projects are identified with a specific project identifier to give the project visibility and to associate all of the orders with the project. BellSouth includes projects in the calculation of its on-time provisioning results. Inclusion of projects in the FOC measurement, may impact the method by which customers submit their ASR's and how BellSouth responds, which in turn could impact the overall project management process and procedures.

Project Management benefits customers through the coordination it brings to ordering and installation activity. Once related orders are in the system and designed, the project manager will add all these orders to the project plan and send it to the team so that each of the departments can verify its work as a whole.

#### **4. Is an Access Service Order, or ASR, for special access service ever rejected after a FOC has issued?**

An ASR, in rare instances, may be rejected (put into clarification) after the FOC (confirmation) is returned to the customer. A possible example of this event could be when a downstream organization determines that the customer's Carrier Facility Assignment is already in use. In this case, BellSouth would place the ASR into clarification and notify the customer of the condition, requesting a new CFA. The subsequent supplemental ASR sent to BellSouth would be measured in its FOC statistics.

5. What is the set of standard intervals BellSouth observes for installation of DS0, DS1 and DS3 circuits? For BellSouth, what are the terms and conditions governing how a buy down of intervals could occur.

**DS0, DS1, & DS3 Services - Standard Intervals:**

BellSouth offers service intervals for Access Services based upon the service type and quantity ordered. An interval is a unit of time, measured in business days, during which a specific aspect of the work order should be accomplished, or (with non-designed services) the business days required to provide the service.

The designation of project and non-project service requests is based upon the service type and quantity of circuits ordered. Non-project service requests may have standard or negotiated intervals. Negotiated intervals are established for non-project service requests by submission of a firm service inquiry. Negotiated intervals are established for project service requests through special handling by BellSouth Project Managers assigned to the request.

With respect to services with negotiated intervals or due dates the customer can request, if necessary, an expedited service due date. BellSouth considers each expedite request on a per case basis and tries to honor the request for service earlier than the established due date.

<b>BellSouth Special Access Service Intervals <u>Non-Project*</u> Services</b>	<b>Interval Business Days</b>
DS0	6
DS1, non channelized, Customer locations in the BellSouth FAS** database	5
DS1, non channelized, Customer locations, not in the FAS** database, where facilities are avail	8
DS1, channelized, With Connecting Facility Assignments (CFA)	5
DS1, channelized, Without Connecting Facility Assignments (CFA)	8
DS3 (AKA BellSouth SPA DS3) collocation or not	Negotiated

\* All projects have negotiated provisioning intervals

\*\* Facility Availability System

## **DS0 & DS1 Services – Service Date Advancement:**

### **Initial Orders:**

- **Standard Intervals:** For services with standard intervals, a service delivery advancement charge of \$200 applies for each day the service date is less than the standard interval.
- **Negotiated Intervals:** For services with negotiated intervals (includes projects, DS1 SmartPath, DS1 Diverse) and the service interval is less than eight business days following the application date (AD), a service delivery advancement charge of \$200 applies for each day the service date is advanced from eight business days.

### **Pending Orders:**

- **Standard Intervals:** For services with standard intervals where the service interval between the subsequent request date and the subsequent due date is four business days or less, a service delivery advancement charge of \$200 applies for each day the service date is less than the standard interval.
- **Negotiated Intervals:** For services with negotiated intervals (includes projects, DS1 SmartPath, DS1 Diverse) where the service interval between the subsequent request date and the subsequent due date is less than eight business days following the application date (AD), a service delivery advancement charge of \$200 applies for each day the revised service date is advanced from the 8 business days. When the service interval between the subsequent request date and the subsequent due date is 8 business days or greater, a service delivery advancement charge does not apply.

## **DS1 Services – Long Service Intervals**

- A 20% discount of non-recurring installation charges will apply to orders for BellSouth SPA DS1 services which have a service interval of 16 business days or greater.
6. **Please identify the groups of customers and classes of service that BellSouth would propose to include "within the BellSouth family" (the analog) and against which parity for services provided IXC's, CLECs, and CMRS providers would be measured.**

The following types of customers and classes of service would be included in the BellSouth family group (the analog) against which services provided for the IXC's, CLECs and CMRS providers would be measured:

BellSouth Long Distance, BellSouth Enterprises, Other BellSouth Affiliates (e.g., BellSouth International, BellSouth Advanced Networks, BellSouth Information Systems, BellSouth Intelliventures, BellSouth.Net), Cingular Wireless, and end-

user customers who purchase special access services from a BellSouth retail unit.

This analog is the same one used for 272 reporting of special access performance and to which the Commission's Enforcement Bureau agreed in conjunction with the BellSouth biennial audit.

**7. Please provide a copy of the business rules governing our 272 metrics reporting obligations.**

See attached 272 Performance Metrics document.

In accordance with Section 1.1206, I am filing this notice electronically and request that you please place it in the record of the proceedings identified above. Thank you.

Sincerely,

A handwritten signature in black ink, reading "Kathleen B. Levitz". The signature is written in a cursive, flowing style.

Kathleen B. Levitz

Attachment

cc: Julie Veach  
Henry Thaggert  
Daniel Shiman  
Pam Megna